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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
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WT Docket No. 96-86

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In the Matter of

The Development of Operational,
Technical, and Spectrum
Requirements for Meeting
Federal, State and Local Public
Safety Agency Communication
Requirements Through the year 2010

To: The Commission

COMMENTS OF THE ALARM INDUSTRY COMMUNICATIONS COMMITTEE

The Alarm Industry Communications Committee ("AICC"), by its attorneys, submits the following comments in the Notice of Proposed Rule Making in the above-captioned proceeding.

AICC is a committee of the Central Station Alarm Association (CSAA), and is charged with monitoring developments at the federal level affecting the ability of the alarm industry to utilize telecommunications technology in providing its valuable protection services to the public. CSAA represents the vast majority of the entities providing central station alarm security protection to the public. The entities represented on AICC are dedicated to providing such services as the alarming of business and individual dwellings, to protect both commercial users and consumers against fire and burglary. More recently, its members have expanded their services to include medical alert protection.

The central station alarm industry provides a public safety service through its alarm monitoring services which safeguard the life and property of its customers. These services reduce the burden on state and municipal governments to provide safety services to its citizens. The central station alarm industry backs up and supports the local police, fire and medical

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services in providing these essential functions. Furthermore, the industry has been working diligently to reduce the number of false alarms to which police and fire agencies must respond. By doing so, the public's tax dollars will go further and these agencies will be better able to respond to the needs of the public that is not equipped with privately monitored burglar and fire alarm services.

AICC submits that in considering the future requirements for the public safety services, the Commission should reconsider what constitutes "public safety." The Commission should look at the functions that are performed, rather than whether the entity performing those functions is a public entity or a private entity. As budget shortfalls limit the services that state and local governments may provide, the private sector will increasingly be required to fill the gap in providing safety and security to the public.

AICC has always believed that the services that the central station industry provides should more properly be classified as public safety. But heretofore the Commission's regulations have only provided for licensing of state and other local governmental entities in the public safety radio services.

AICC supports the proposal to expand the definition of public safety to include a "Public Service" eligibility classification. This definition would include eligibility for non-public safety entities that furnish, maintain, and protect the nation's basic infrastructures which are required to promote the public's safety and welfare. The burglar, fire and medical alarm monitoring services provided by the central station industry fall squarely within this definition of "public service."

AICC also wants to make clear that it does not seek access to the channels that are

currently allocated to the public safety services. AICC simply requests that the channels that have been reserved within the Business Radio Service for assignment to UL-listed central station alarm companies, as well the new interstitial narrow band channels recently allocated for the same purpose by the Commission's PR Docket 92-235 refarming proceeding, be moved from the Business Radio Service to the Public Safety Radio Services. Similarly, AICC does not propose that its dedicated channels be available to other public safety agencies on a routine basis. However, it does not object to use of its channels for direct communication with police and fire agencies investigating a burglar or fire alarm.


The central station reserved frequencies have been used for dispatching of personnel to install and maintain fire and burglar alarm systems, dispatching of security guards to investigate alarm signals, and in many cases the transmission of alarm signals from protected premises to alarm monitoring facilities. The frequencies have in some cases also been used for transmission of alarm messages directly to police and fire agencies. This is a system that has worked well over the years. The central station industry has not used public safety channels for direct communication with public safety agencies; it has used its own frequencies for that purpose.

But clearly there are situations where direct communication between security guards responding to alarms and police and fire agencies and rescue squads may save lives or reduce property damage. In those situations, common frequencies for communication between central station operators and public safety agencies would be useful. AICC supports the Commission

proposal to make channels available specifically for mutual aid purposes among all public safety eligibles so that all personnel providing safety of life and property may have common channels for immediate communication in the event of emergencies.

Respectfully submitted,

Alarm Industry Communications Committee

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